

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

UNITED STATES OF AMERICA

v.

Case No. 3:04CR00032

JEFFREY ALLEN PATCH

**MOTION FOR MODIFICATION**  
**OF CONDITIONS OF RELEASE**

Comes now the defendant, Jeffrey Allen Patch, by counsel,  
and moves for modification of the conditions of release,  
representing the truth of the following:

1. By an order of the court on April 7, 2004, the  
defendant was released on bail secured by an appearance bond inn  
the amount of \$25,000.

2. The conditions of release included home detention with  
electronic monitoring, and a requirement that at least one of  
his parents be present in the home at all times and accompany  
the defendant on trips outside the home.

3. The defendant has been completely compliant with all  
the conditions imposed upon him by the court's order.

4. The defendant is scheduled to under an MRI procedure  
on July 7, 2005. This procedure requires the removal of the  
ankle bracelet that is part of the electronic monitoring system.

5. Electronic monitoring is no longer needed to insure the defendant's appearance or the safety of the community.

WHEREFORE, your defendant prays that the conditions of his release be modified to eliminate the requirement of electronic monitoring and substitute in its place a restrictive curfew as determined by the pretrial release officer.

Respectfully submitted,

JEFFREY A. PATCH

By Counsel

Counsel:

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Nancy S. Healey, AUSA; and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

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